



Cathleen A. Massey
Vice President - External Affairs

AT&T Wireless Services, Inc.
Fourth Floor
1150 Connecticut Ave. NW
Washington, DC 20036
202 223-9222
FAX 202 223-9095

October 17, 1997

The Honorable Reed E. Hundt
Chairman
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20054

RECEIVED
OCT 17 1997
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Additional Comments Regarding Wireless Enhanced 911 Services
CC Docket No. 94-102; RM-8143; DA 97-2751

Dear Chairman Hundt:

AT&T Wireless Services, Inc. ("AT&T") fully supports the proposals set forth in the letter filed by representatives of the wireless industry and the public safety community requesting modifications to the Commission's regulations governing enhanced 911 ("E-911") service.^{1/} As the Joint Letter points out, Commission action is necessary to address technical and practical impediments to the implementation of the E-911 rules.

Most importantly, the Joint Letter proposes an amendment to Section 20.18(b) of the Commission's rules, which currently requires licensees to process "all 911 calls which transmit a Code Identification," and "all 911 calls which do not transmit a Code Identification" where requested by the designated PSAP. The Commission has defined "Code Identification" as "a call originated from a mobile unit which has a Mobile Identification Number (MIN)."^{2/} As set forth in the Joint Letter and in the previous comments of AT&T and other wireless carriers, the use of the term "Code Identification" does not accurately characterize the way wireless technology

^{1/} Letter from the Cellular Telecommunications Industry Association ("CTIA"), the Personal Communications Industry Association ("PCIA"), the Association of Public-Safety Communications Officials-International, Inc. ("APCO"), the National Emergency Number Association ("NENA"), and the National Association of State Nine-One-One Administrators ("NASNA") to Reed Hundt, Chairman, FCC (September 25, 1997) ("Joint Letter"); Additional Comment Sought in Wireless Enhanced 911 Reconsideration Proceeding Regarding Rules and Schedules, Public Notice, DA 97-2751 (rel. Oct. 3, 1997).

^{2/} In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102, RM-8143, Report and Order and Further Notice of Proposed Rulemaking, FCC 96-264 at ¶ 10 n.12 (rel. July 26, 1996).

No. of Copies rec'd 075
List ABOVE



operates.^{3/} In particular, because the MIN does not always serve as a unique identifier, transmitting that number will not necessarily ensure call-back capability. This issue will become overwhelmingly complex as wireless carriers implement number portability. Accordingly, AT&T agrees with the Joint Letter that the Commission should modify Section 20.18(b) to require licensees to process "all successfully validated wireless 911 calls" and to process "all wireless 911 calls" where requested to do so by the relevant 911 authority. This would reflect more accurately the current state of wireless technology and alleviate in part problems associated with implementing the call-back requirements, while still achieving the Commission's goal of providing access to E-911 services to a larger universe of potential callers.

Significantly, the Joint Letter reflects the views of representatives of both the wireless industry and the public safety community. As AT&T emphasized in its petition for reconsideration, requiring carriers to transmit calls from non-service initialized handsets will cause problems for both wireless carriers and PSAPs, especially regarding call-back capability.^{4/} While Representative Eshoo believes that it is in the public's best interest for all wireless 911 calls to be passed to PSAPs,^{5/} many public safety authorities do not want such a requirement imposed upon them. Instead, as the Commission found previously, individual public safety authorities should be able to decide whether or not to require all 911 calls to be processed. Under the proposed modification, public safety authorities retain that ability.^{6/}

AT&T also supports the request for an extension of time of the Commission's deadline for implementation of 911 services over digital wireless systems for TTY/TDD users. AT&T is participating in industry efforts to develop solutions that support the transmission formats of TTY/TDD over digital wireless systems and address the interface issues that analog and digital

^{3/} See, e.g., Additional Comments of AT&T Wireless Services, Inc. (filed July 28, 1997); Letter from Mary Madigan, Vice President, External Affairs, PCIA, to John Cimko, Chief, Policy Division, FCC (July 10, 1997); Letter from Carol Bjelland, Director, Regulatory Affairs, GTE Service Corporation, to John Cimko, Chief, Policy Division, FCC (July 7, 1997).

^{4/} Petition for Reconsideration of AT&T Wireless Services, Inc. at 5-7 (filed Sept. 3, 1996) ("AT&T Reconsideration Petition").

^{5/} Letter from Congresswoman Anna G. Eshoo to Reed Hundt, Chairman, FCC (Sept. 29, 1997).

^{6/} AT&T agrees with the Joint Letter's suggestion that, until Phase II location technology is in place, 911 authorities should coordinate within each area served by a carrier's switch about the type of calls to receive.

Chairman Hundt
October 17, 1997
Page 3

products have with TTY/TDD technologies. AT&T agrees that an additional 18 months is needed to develop these solutions.

Finally, with regard to the issue of carrier liability, AT&T shares the concerns raised in CTIA's separate letter of September 26, 1997. Although the Joint Letter notes almost in passing that decisions regarding carrier liability should be deferred, prompt resolution of this issue is critical. If carrier liability is not addressed either by the states or the Commission before the requirements for providing E-911 service are imposed, wireless carriers will be exposed unnecessarily to risk. AT&T continues to believe that the Commission should establish a minimum standard of protection for wireless carriers.⁷¹ To the extent the Commission is concerned about preempting state tort law, it could issue a temporary default rule that would apply only where states have not resolved the issue. This would provide wireless carriers with the same protection from liability that wireline carriers currently receive where states have not yet resolved the issue.

Refining the Commission's rules as set forth above will speed the implementation of wireless E-911 services to the public. Thank you in advance for your consideration of our views.

Sincerely,

Cathleen A. Massey / by SFS

Cathleen A. Massey

cc: The Honorable Susan Ness
The Honorable James Quello
Daniel Grosh
Ron Netro
John Cimko
Michael Altschul
Robert Gurss

The Honorable Rachelle Chong
David Furth
Nancy Boocker
Carol Bjelland
David Wye
Mary Madigan
Jim Hobson

⁷¹ See AT&T Reconsideration Petition at 7.